

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Robert Dedmon,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO. 4:21-cv-03371
	§	
vs.	§	Jury Demand
	§	
Shell Exploration & Production	§	
Company and Shell Trading	§	
Services Company,	§	
	§	
<i>Defendants.</i>	§	

JOINT AGREED MOTION TO EXTEND
PRETRIAL MATERIALS OBJECTIONS AND RESPONSE DEADLINE

Status report on settlement. The parties mediated this case on December 31, 2024 but thereafter continued settlement negotiations through the mediator. The parties' efforts have been delayed because Shell has multiple decisionmakers and, at one point, one of them was unavailable in a previously scheduled out-of-state trial during a portion of the post-mediation negotiations. Settlement negotiations are ongoing.

The parties will promptly notify the Court if the case settles or if an impasse is reached on settlement.

Nature of the case and February 18, 2025 deadline. This is an unlawful employment practices case. It involves a current, and now former, employee's claims for race and color discrimination. It alleges a national unlawful pay practice dating back to at least 2014 and ongoing systemic discrimination concerning compensation and job grades. Shell disputes the allegations and asserts a number of defenses.

February 18, 2025 is the current deadline to file objections to pretrial materials and responses to motions in limine, which the parties submitted last week. Docket call is currently scheduled for March 11, 2025.

Requested relief and follow-up report on settlement. The parties respectfully request an extension through and including [February 28, 2025](#) to file objections to pretrial materials and responses to motions in limine. After consulting regarding their schedules, the parties' lead counsel are set to confer on February 20, 2025 regarding pretrial materials, including objections and responses to pretrial materials.

Respectfully submitted,

/s/ Amy Gibson

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CERTIFICATE OF COMPLIANCE

The following is based on the word-count tool in the most current version of Microsoft® Word for Mac. The undersigned certifies that the foregoing *joint motion* contains 560 words, *including* the case caption, any table of contents, any table of authorities, the signature block, and all certificates.

/s/ Amy Gibson

Amy E. Gibson

CERTIFICATE OF SERVICE

The undersigned certifies that, on February 18, 2025, she filed the foregoing *joint motion* with the United States District Court for the Southern District of Texas through the CM/ECF system, such that the Shell Defendants should be served with a copy of the filed document as follows:

VIA CM/ECF SYSTEM

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